

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EXXON MOBIL CORPORATION,

Plaintiff,

v.

MAURA TRACY HEALEY, Attorney General
of Massachusetts, in her official capacity,

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: December 16, 2016

No. 1:16 Misc. 458-P1

**STIPULATION SUSPENDING
BRIEFING SCHEDULE**

This Stipulation is entered into between Plaintiff Exxon Mobil Corporation ("ExxonMobil") and Third-Party Movant 350.org.

WHEREAS, on December 9, 2016, 350.org filed a motion to quash a third-party subpoena issued to it by ExxonMobil in a pending action in the United States District Court for the Northern District of Texas;

WHEREAS, ExxonMobil has not yet filed papers opposing the motion to quash, or any cross-motion in connection with the subpoena;

WHEREAS, on December 15, 2016, the United States District Court for the Northern District of Texas stayed all discovery in the underlying action pending further order of that Court;

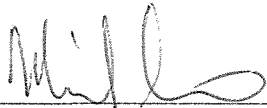
WHEREAS, ExxonMobil and 350.org wish to avoid potentially unnecessary litigation, and do not wish to burden this Court unnecessarily;

NOW, THEREFORE, IT IS STIPULATED AND AGREED as follows:

1. Briefing on 350.org's motion to quash is suspended; and
2. If the stay of discovery is lifted by the United States District Court for the

Northern District of Texas, 350.org and ExxonMobil will meet and confer and propose a schedule to conclude briefing on 350.org's motion to quash and any cross-motions that ExxonMobil may make relating to the subpoena.

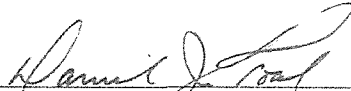
CHADBOURNE & PARKE LLP



Abbe David Lowell
adlowell@chadbourne.com
Michael A. Samalin
msamalin@chadbourne.com
1301 Avenue of the Americas
New York, NY 10019-6022
(212) 408-5100

Counsel for 350.org

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON, LLP



Theodore V. Wells, Jr.
twells@paulweiss.com
Michele Hirshman
mhirshman@paulweiss.com
Daniel J. Toal
dtoal@paulweiss.com
Justin Anderson
janderson@paulweiss.com
1285 Avenue of the Americas
New York, NY 10019-6064
(212) 373-3000
Fax: (212) 757-3990

Counsel for Exxon Mobil Corporation

Dated: New York, New York
December 16, 2016

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE

SITTING IN PART I